

Cassels

April 13, 2022

Via Email, Fax or Courier

Please see attached Service List

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file # 28677-31

Dear Sirs and Mesdames:

**Re: Court File No. 2101-00809
Bank of Montreal v. Metro Paving and Roadbuilding Ltd., et al.
Application scheduled for Friday, April 22, 2022 at 10:00 AM (the “Application”)**

We are counsel to BDO Canada Limited in its capacity as receiver and manager (in such capacity, the “Receiver”) of the property of Metro Paving and Roadbuilding Ltd., Metro Paving Ltd., Metro Pars Corporation and Grasslands of Beiseker Development Corporation (in such capacity, the “Receiver”).

Further to the above-referenced matter and the Application, please find enclosed the following materials which have been submitted for filing:

1. Application of BDO Canada Limited which attaches to it as Schedules “A”, “B”, “C” and “D”, respectively, draft copies of two sale approval and vesting orders, a sealing order and an order dealing with other general matters;
 - a. blacklines comparing the draft sale approval and vesting orders to the Alberta Model Order; and
2. Fourth Report of the Receiver dated April 13, 2022.

(collectively, the “Application Materials”).

For email recipients, copies of the Application Materials including all previously filed materials, can be downloaded at the following open channel Titan File link: <https://casselsbrock.titanfile.com/channels/sXbBRV/>. You should also receive an email from Richard Kay on behalf of Titan File indicating new materials have been uploaded. Proof of filing of the Application Materials will be uploaded upon receipt.

If you received this letter and the Application Materials by courier and wish to obtain access to the Application Materials via Titan File or you're an email recipient encountering issues accessing the Titan File link, please contact Richard Kay at rkay@cassels.com. Otherwise, copies of the Application Materials and materials previously filed in this proceeding will also be publicly available for download shortly from the Receiver's website: <https://www.bdo.ca/en-ca/extranets/metrogroupofcompanies/>.

Finally, please see the enclosed instructions for accessing the virtual courtroom that has been assigned for the Application.

We trust you will find the foregoing and enclosed to be in order.

Yours truly,
Cassels Brock & Blackwell LLP

A handwritten signature in cursive script that reads "Jeffrey Oliver". The signature is written in black ink and is positioned below the typed name and title.

Jeffrey Oliver
Partner
JO/rk

SCHEDULE A – WebEx Details

Counsel: Please ensure that all relevant parties have received Webex information.

Virtual Courtroom 60 has been assigned for the above noted matter:

Virtual Courtroom Link:

<https://albertacourts.webex.com/meet/virtual.courtroom60>

Instructions for Connecting to the Meeting

1. Click on the link above or open up Chrome or Firefox and cut and paste it into your browser address bar.
2. If you do not have the Cisco Webex application already installed on your device, the site will have a button to install it. Follow installation instructions. Enter your full name and email address when prompted
3. Click on the **Open Cisco Webex Meeting**.
4. You will see a preview screen. Click on **Join Meeting**.

Key considerations for those attending:

Please connect to the courtroom **15 minutes prior** to the start of the hearing.

Please ensure that your microphone is muted and remains muted for the duration of the proceeding, unless you are speaking. Ensure that you state your name each time you speak.

If bandwidth becomes an issue, some participants may be asked to turn off their video and participate by audio only.

Note: Recording or rebroadcasting of the video is prohibited.

Note: It is highly recommended you use headphones with a microphone or a headset when using Webex. This prevents feedback.

If you are a non-lawyer attending this hearing remotely, **you must** complete the undertaking located here: <https://www.albertacourts.ca/qb/resources/announcements/undertaking-and-agreement-for-non-lawyers>

For more information relating to Webex protocols and procedures, please visit:

<https://www.albertacourts.ca/qb/court-operations-schedules/webex-remote-hearings-protocol>

You can also join the meeting via the "Cisco Webex Meetings" App on your smartphone/tablet or other smart device. You can download this via the App marketplace and join via the link provided above.

COURT FILE NUMBER 2101-00809

COURT COURT OF QUEEN'S BENCH OF ALBERTA

JUDICIAL CENTRE CALGARY

PLAINTIFF BANK OF MONTREAL

DEFENDANTS METRO PAVING AND ROADBUILDING LTD., METRO PAVING LTD.,
METRO PARS CORPORATION and GRASSLANDS OF BEISEKER
DEVELOPMENT CORPORATION (the "**Metro Entities**")

SERVICE LIST
(Updated: April 13, 2022)

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<p>Hi-Mark Enterprises Ltd. o/a Pro-Built Alternators & Starters c/o T&S Collections Ltd. #105, 412 – 53 Avenue SE Calgary, AB T2H 0N4</p> <p>Attn: Ken Pratherts Email: kenpratherts@shaw.ca</p>	<p>Potential Creditor of Metro Paving and Roadbuilding Ltd.</p>
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<p>Reynolds Mirth Richards & Farmer LLP 3200, 10180 – 101 Street Edmonton, AB T5J 3W8</p> <p>Attn: Paul D. Greep Email: pgreep@rmrf.com</p>	<p>Counsel for Lafarge Canada Inc., creditor of Metro Paving and Roadbuilding Ltd.</p>
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<p>Summit Acceptance Corp. 1260 Highfield Cres SE Calgary, AB T2G 5M3</p> <p>Attn: Darren Peterson Email: dpeterson@summitacceptance.com</p>	<p>PPR registrant against Metro Pars Corporation and Metro Paving and Roadbuilding Ltd.</p>
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<p>Wells Fargo Equipment Finance Company 1100, 1290 Central Parkway W Mississauga, ON L5C 4R3</p> <p>Attn: Connie Roberts Marc Ethier Gloria Myers Email: connie.m.roberts@wellsfargo.com Marc.Ethier@wellsfargo.com Gloria.Myers2@myleasingsource.com</p>	<p>PPR registrant against Metro Pars Corporation and Metro Paving and Roadbuilding Ltd.</p>
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